

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**MARGARET NEVILLE  
2005 E. Madison Street  
Philadelphia, PA 19134**

**V.**

**U.S. DEPARTMENT OF HOMELAND SECURITY  
U.S. CITIZENSHIP & IMMIGRATION SERVICES  
1600 CALLOWHILL STREET  
PHILADLEPHIA, PA 19130**

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**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

1. This is an action under the Freedom of Information Act, 5 USCA § 552 to order the production of agency records, consisting of the Contents of the Alien file relating to the Plaintiff's husband Mondy Shegaj agency file number A 78 206 662
2. This court has jurisdiction over this action pursuant to 5 USCA § 552(a)(4)(B).
3. Plaintiff, is the United States Citizen spouse of the subject of the file who has initiated petition proceedings before the aforesaid agency. She is the requester of the records that have been withheld.
4. Defendant is an agency of the United States, and it has possession and control over the record requested by the plaintiff.
5. By formal request utilizing USCIS form G-639 received on February 27, 2007, the Plaintiff requested a copy of the subjects alien file..
6. To date, the agency has withheld the documents without explanation, in violation of law and regulation.
7. The plaintiff has the statutory right to the requested records and there is no legal basis for the defendant's refusal to disclose them to the plaintiff.

**WHEREFORE**, the plaintiff prays that this Court:

- (1) declare that the defendant's refusal to disclose the records requested by the plaintiff is unlawful;
- (2) order the defendant to make the requested records available to the plaintiff;
- (3) award the plaintiff the costs and reasonable attorney fees in this action; and
- (4) grant such other relief as the Court may deem just and proper.

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